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6 *Attorney for Plaintiff*

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 KIM BIRON, an individual,

11 Plaintiff,

12 vs.

13 WYNDHAM VACATIONS OWNERSHIP, INC.,
14 doing business as a foreign corporation,

15 Defendants.

CASE NO: 2:19-cv-01695-RFB-EJY

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
RESPOND TO DEFENDANT'S
MOTION FOR SUMMARY
JUDGMENT
(Third Request)**

16 COMES NOW, Plaintiff, KIM BIRON, ("Plaintiff"), by and through her counsel, the law
17 firm of Hatfield & Associates, Ltd., and Defendant WYNDHAM VACATIONS OWNERSHIP,
18 INC. ("Defendant") by and through its counsel, Amy L. Thompson, Esq., of the law firm of Littler
19 Mendelson, P.C., hereby stipulate and agree to extend the time for Plaintiff to Respond to
20 Defendant's Motion for Summary Judgment (ECF #49). This request is submitted pursuant to LR
21 IA 6-1, 6-2 and LR II 7-1 and 26-4 and is the parties' third request for an extension of time for
22 Plaintiff to respond to Defendant's Motion for Summary Judgment.
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24 Good cause exists for this extension, Plaintiff's counsel's paralegal has been out of the
25 office on leave due to needing to care for a family member following surgery with complications,
26 which has caused a backflow of work. Additionally, Plaintiff's counsel will need to confer with his
27 client regarding the facts of the attendant motion and his client has not been available to do so.
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1 Accordingly, Plaintiff shall have up to and including July 2, 2021, to respond to Defendant's
2 Motion for Summary Judgment (ECF #49). Defendant's reply to Plaintiff's response will be
3 extended to July 30, 2021.

4 Dated this 21st day of June, 2021

Dated this 21st day of June, 2021

5 **HATFIELD & ASSOCIATES**

LITTLER MENDELSON, P.C.

6 */s/ Trevor J. Hatfield*

/s/ Amy L. Thompson

7 By: _____
8 Trevor J. Hatfield, Esq. (SBN 7373)
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13 *Attorney for Plaintiff*

By: _____
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Attorneys for Defendant

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15 **IT IS SO ORDERED:**

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19 **RICHARD E. BOULWARE, II**
20 **United States District Court**

21 DATED this 22nd day of June, 2021.
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Certificate of Service

I certify that on the 21st day of June, 2021 electronically filed **STIPULATION AND ORDER FOR TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT (Third Request)** with the Clerk of the Court using the ECF system which served the parties hereto electronically.

Dated this 21st day of June, 2021 By: /s/ Freda P. Brazier
An employee of Hatfield & Associates, Ltd.